

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

2012 DYNASTY UC LLC; FLINN
INVESTMENTS, LLC; LAWRENCE
FLINN, JR. 1975 TRUST FBO ADRIANE
S. FLINN; LAWRENCE FLINN, JR. 1975
TRUST FBO LAWRENCE FLINN III;
LFJR 2010 GRAT REMAINDER TRUST;
LFJR 2012 DYNASTY LLC - SERIES A;
LAWRENCE FLINN, JR. 1975 TRUST
FBO MARION FLINN MOULTON;
STEPHANIE AND LAWRENCE FLINN,
JR. CHARITABLE TRUST; and
STEPHANIE S. FLINN MASTER
PARTNERSHIP,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; J. MICHAEL
PEARSON; HOWARD B. SCHILLER;
ROBERT L. ROSIELLO; TANYA CARRO;
and PRICEWATERHOUSECOOPERS,

Defendants.

Civil Action No. 18-08595 (MAS) (LHG)

STIPULATION AND

ORDER

WHEREAS, Plaintiffs in the above-captioned action have filed a Complaint against Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, Tanya Carro, and PricewaterhouseCoopers LLP (together, "Defendants," and together with Plaintiffs, the "Parties");

WHEREAS, counsel for Defendants have agreed to accept service of the Complaint;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that:

(a) Defendants' Motions to Dismiss dated December 6, 2017, filed in *Lord Abbett Investment Trust – Lord Abbett Short Duration Income Fund, et al v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-6365 (MAS) (LHG) (the “*Lord Abbett Action*”) (Dkt. Nos. 58-62) (the “*Lord Abbett Motions to Dismiss*”), and the subsequent omnibus briefing filed by the Parties in the *Lord Abbett Action* (Dkt. Nos. 83-84, 99-102) shall be deemed to apply to the claims brought by the Plaintiffs;

(b) The Court's disposition of the *Lord Abbett Motions to Dismiss* shall be deemed to apply to the claims brought by the Plaintiffs and the Parties in the above-captioned action;

(c) Any grounds for dismissal not raised in the *Lord Abbett Motions to Dismiss* may be raised in supplemental briefing in this action (the “*Supplemental Motions to Dismiss*”), with any such opening briefs due June 15, 2018, briefs in opposition due July 13, 2018, and any reply briefs due July 27, 2018; and

(d) Defendants will answer the Complaint within 45 days of the termination of the stay, or within 45 days of the resolution of the *Lord Abbett Motions to Dismiss* and the *Supplemental Motions to Dismiss*, whichever is later.

Stipulated and agreed to by:

DATED: June 4, 2018

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So Ordered this 5th day
of June, 2018


Hon. Michael R. Williams